

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

DOCKET NO. 04 11572 JLT

SUSAN COONEY,)
Plaintiff)

v.)

HUMANISTIC PSYCHOLOGY INSTITUTE,)
d/b/a SAYBROOK INSTITUTE and)
MAUREEN O HARA, Individually)
Defendants)

JOINT MOTION OF THE PARTIES TO EXTEND DISCOVERY DEADLINE

Plaintiff Susan Cooney and Defendants Humanistic Psychology Institute and Maureen O'Hara, by their counsel of record, jointly move the Court to extend the discovery deadline from January 31, 2006 through March 31, 2006. As grounds in support of this motion, the parties state as follows:

1. In accordance with Local Rule 16.1, the parties submitted a Joint Statement regarding the pretrial schedule and proposed that all factual discovery be completed by March 3, 2006.
2. In its order of May 11, 2005, the Court ruled that discovery must be completed by January 31, 2006.
3. The parties have substantially responded to written discovery requests, and are working to resolve certain discovery disputes.

4. Due to the aforementioned discovery disputes, as well as scheduling conflicts for the witnesses, the parties have been unable to complete depositions. The parties expect that depositions cannot be completed by January 31, 2006.

5. The parties anticipate that the depositions of parties and fact witnesses can be scheduled and completed by March 31, 2006.

6. The proposed extension of the discovery deadline will not prejudice either party, and it will not delay the final disposition of this case.

WHEREFORE, the parties jointly move the court to extend the discovery deadline to March 31, 2006.

Respectfully submitted,

/s/ Paul W. Morenberg

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Dated: January 20, 2006